

"Partnering to promote, protect and preserve health in our community."

Reduced Oxygen Packaging for Retail Sale

Reduced Oxygen Packaging (ROP) of food that has the potential to grow *Clostridium botulinum* requires an approval from the health department. *Listeria monocytogenes* is another bacteria that must be controlled. Contact the health department if you are packaging food using the Reduced Oxygen Pathogen Method and you are unsure if your product can support the growth of *C. botulinum* or *L. monocytogenes*.

Section 3-502.12 of the Idaho Food Code **requires** the processor to submit a Hazard Analysis Critical Control Point Plan (HACCP) to the health department for their review. The maximum shelf life is 14 days when the product is refrigerated at 41° F or below. Fish is prohibited from being vacuum packaged and held refrigerated.

HACCP plans are to be established and implemented by the food establishment, but are also to be assessed by the health department. The Idaho Food Code 8-201.14 describes the contents of a HACCP plan. You may develop the HACCP plan or hire a consultant to help you. The health department cannot be your consultant. Hiring a consultant will expedite the process for you. The University of Idaho Food Technology Center in Caldwell is an available resource. A food processing class will help you identify the potential hazards in your process and reduce the risk of selling or serving unsafe packaged food.

The process controls in your HACCP plan for food safety are critical and documentation is required. Standard operating procedures (SOP), sanitation standard operating procedures (SSOP), temperature control, temperature control logs must be developed. Corrective action plans, regular monitoring and verification will be a part of your HACCP plan.

Below is the rule/regulation in the Idaho Food Code concerning Reduced Oxygen Packaging.

3-502.12 [Reduced Oxygen Packaging, Criteria.](#)*

(A) Except for a FOOD ESTABLISHMENT that obtains a VARIANCE as specified under § 3-

502.11, a FOOD ESTABLISHMENT that packages FOOD using a REDUCED OXYGEN

PACKAGING method and *Clostridium botulinum* is identified as a microbiological

HAZARD in the final PACKAGED form shall ensure that there are at least two barriers in

place to control the growth and toxin formation of *C. botulinum*.

(B) A FOOD ESTABLISHMENT that packages FOOD using a REDUCED OXYGEN PACKAGING

method and *Clostridium botulinum* is identified as a microbiological HAZARD in the final

PACKAGED form shall have a HACCP PLAN that contains the information specified under

¶ 8-201.14(D) and that:

(1) Identifies the FOOD to be PACKAGED

(2) Limits the FOOD PACKAGED to a FOOD that does not support the growth of

Clostridium botulinum because it complies with one of the following:

(a) Has an aw of 0.91 or less,

(b) Has a PH of 4.6 or less,

(c) Is a MEAT or POULTRY product cured at a FOOD PROCESSING PLANT

regulated by the U.S.D.A. using substances specified in 9 CFR 318.7

Approval of substances for use in the preparation of products and 9 CFR 65

381.147 Restrictions on the use of substances in POULTRY products and is received in an intact package,
or

(d) Is a FOOD with a high level of competing organisms such as raw MEAT or raw POULTRY;

(3) Specifies methods for maintaining FOOD at 5°C (41°F) or below;

(4) Describes how the packages shall be prominently and conspicuously labeled

on the principal display panel in bold type on a contrasting background, with instructions to;

(a) Maintain the FOOD at 5°C (41°F) or below, and

(b) For FOOD held at refrigeration temperatures, discard the FOOD if within

14 calendar days of its packaging it is not served for on-PREMISES

consumption, or consumed if served or sold for off-PREMISES consumption;

(5) Limits the refrigerated shelf life to no more than **14 calendar days** from

packaging to consumption or the original manufacturer's "sell by" or "use by" date, whichever occurs first;

(6) Includes operational procedures that:

(a) Prohibit contacting FOOD with bare hands,

(b) Identify a designated area and the method by which:

(i) Physical barriers or methods of separation of raw FOODS and

READY-TO-EAT FOODS minimize cross contamination, and

(ii) Access to the processing EQUIPMENT is limited to responsible

trained personnel familiar with the potential HAZARDS of the operation and

(c) Delineate cleaning and SANITIZATION procedures for FOOD-CONTACT SURFACES and

(7) Describes the training program that ensures that the individual responsible for the REDUCED OXYGEN PACKAGING operation understands the:

(a) Concepts required for a safe operation,

(b) EQUIPMENT and facilities, and

(c) Procedures specified under Subparagraph (B)(6) of this section and ¶ 8-201.14(D).66

(C) Except for FISH that is frozen before, during, and after packaging, a FOOD

ESTABLISHMENT may not package FISH using a REDUCED OXYGEN PACKAGING method

Resource: University of Idaho, Food Technology Center
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